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ABSTRACT

This monograph addresses difficulties with integrating New Zealand university degree qualifications into standards established for secondary education and non-university tertiary education under the National Qualifications Framework resulting from the Education Amendment Act (1990). An introduction, Part 1, reviews the development of the framework and identifies major objections of the Vice Chancellors' Committee including the perceived incompatibility of the framework's unit standards with the nature and aims of most university degree courses. Part 2 identifies and briefly discusses each of the following perceived problem areas in the new framework: (1) the behaviorist/reductionist definition of unit standards and their implications for course design; (2) the separation of unit standards from the course design process; (3) the registration of elements/objectives; (4) the association of performance criteria with course elements rather than with the assessment tasks that with course elements; (5) lack of recognition of research findings on the transfer of generic skills; (6) the incompatibility of the framework for integrating unit standards with the notion of excellence; (7) the disruptive effect of unit-standard methodology on the coherence and integrity of a university degree; (8) the difficulty of assigning academic units to a level in the framework; (9) the incompatibility of the framework for integrating postgraduate university programs; and (10) different philosophies on credit transfer and the recognition of prior learning. Part 3 proposes an alternative dual structure covering university and non-university qualifications and development of systems for dealing with movements between the two. (DB)

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NEW ZEALAND VICE-CHANCELLORS' COMMITTEE

The National Qualifications Framework and the Universities

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Dr T N M Waters
Chairman
New Zealand Vice-Chancellors' Committee

11 May 1994

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Part 1
Introduction

As a consequence of the Education Amendment Act 1990, the New Zealand Qualifications Authority has been charged with developing a framework for national qualifications in secondary schools and in post-school education and training in which:

'(i) all qualifications . . . have a purpose and a relationship to each other that students and the public can understand; and

(ii) there is a flexible system for the gaining of qualifications, with recognition of competency already achieved'.
(Education Amendment Act, 1990, Section 253 (c).)

Currently, the NZQA is proposing to fulfil its brief by introducing a National Qualifications Framework that would establish a single system for all qualifications available through secondary and tertiary education, including university degrees. The Framework has been designed to allow students to move between different programmes, and between different educational institutions, through more extensive provisions for credit transfer, and for recognition of prior learning (such as work-based learning, or experiential learning). 'Units of learning' are to serve as the building-blocks for the proposed system; that is, modules of study within a subject that are defined in terms of content, together with learning outcomes that are measured according to performance criteria. It is anticipated that units of learning will be able to be arranged in a variety of ways to construct different courses for different needs, and that packages of units of learning, some compulsory and others optional, will then become the basis for all national and nationally recognised qualifications. Transferability between qualifications is to be encouraged and promoted by the separation of standards from curriculum design (so that units of learning need not be context-specific), by a shift away from an emphasis on inputs and process to a focus on outputs (defined as competencies), and an assumption of interchangeable equivalency between academic and vocational subjects that have been assigned to a given level of the Framework. In due course, the NZQA intends that all existing national and nationally recognised courses should be required to be written in a unit of learning format[1], and that, once defined, units will be assigned to one of the eight levels of the Framework, according to the level of the generic skill(s) they are deemed to embody.

1. *Designing The Framework: A Discussion Document about Restructuring National Qualifications* (Wellington: New Zealand Qualifications Authority, 1991), pp. 44-50.

The New Zealand Vice-Chancellors' Committee believes that in many respects the attempt to devise a national system in which all qualifications have a relationship to each other that students and the public can understand is to be encouraged. There is merit in establishing a nationwide system for registering educational achievement, and with respect to vocational training the Framework appears, to some extent, to be achieving the intent stated in the Act - although doubts have recently been raised about adequacy of the unit-standards approach for vocational as well as academic training[2]. There is also merit in encouraging different industry and professional groups to search for the common elements in the professional training of employees, and all educational groups will benefit from greater understanding of the extent to which generic skills and competencies can, or cannot, be transferred from one domain to another. Moreover, because the Qualifications Authority's initiative has been widely publicised and debated among educators, as well as amongst the general public, employer, and professional groups, it has had a beneficial influence on education within the universities, by encouraging academic teachers to ponder more deeply the nature and purpose of university study, and make more explicit the expectations they have of students (for example, through the writing of objectives).

Nevertheless, in spite of approving the general intent of the Act, the NZVCC harbours grave doubts as to whether it is practicable or desirable for the Framework proposed by the NZQA to encompass tertiary degrees. In particular, the NZVCC believes that the model for developing and registering unit standards upon which the whole Framework depends is incompatible with the nature and aims of most university degree courses. Being based on notions of competency, the unit-standard methodology makes insufficient allowance for the progressive development of conceptual skills that is characteristic of university education. Moreover, being fragmentary in its effects, it cuts across the assumption that a university degree should display, in addition to breadth and depth, a coherent integrity in the way its components are put together[3]. Apart from this, the NZVCC believes that, even if it were desirable to recast university qualifications in unit-standard format, which it is not, it would still be impossible to fit them comfortably into the eight levels of the Framework as it presently exists. There are also important issues relating to the recognition of prior learning and credit transfer that remain unresolved.

Awareness of these and other problems led the New Zealand Vice-Chancellors' Committee in late 1993 to solicit submissions from the universities on the National

2. See Alan Smithers, *All Our Futures: Britain's Education Revolution. A Dispatches Report on Education* (London: Channel Four Television, 1993).

3. See Section 2.7 below.

Qualifications Framework, with a view to identifying issues of concern and formulating a common position with respect to them. Submissions were received from academic teachers and researchers representing a wide range of the disciplines taught in New Zealand universities. Based on these submissions, the present booklet summarises areas of broad agreement, and presents the New Zealand Vice-Chancellors' Committee's position on how university qualifications may more appropriately be registered in a national system than is possible within the existing National Qualifications Framework. This paper proposes that the universities' own approval structure, operating through the NZVCC's Committee on University Academic Programmes, is no less a system for coordinating and registering qualifications than the NZQA's National Framework, and that this Committee, together with the New Zealand Universities Academic Audit Unit is the most appropriate body for assuring the quality of the design, monitoring, and evaluation of courses and programmes of study for university qualifications. The NZVCC considers that, rather than assimilating university qualifications into a framework that is incompatible with their nature, educational objectives, and complexity, an attempt should be made to develop appropriate systems for articulation between the two structures. The following two sections of this booklet will explain these propositions in greater detail.

It should be noted that this publication deals with academic issues only, and not with legal issues relating to the Framework, which have been taken up elsewhere. But it should be noted that the NZVCC has consistently held that the 'national qualifications' referred to in Section 253 (c) of the Act did not, and were never meant to, include university degrees. The NZQA itself, in its Briefing Paper for the Incoming Government (December 1993) has written that 'legislative amendment appears necessary to indicate that degrees are national qualifications and consequently part of the Framework' (§19, p. 7).

Part 2
Difficulties in Integrating University Qualifications into the Framework

New Zealand universities have been under pressure to integrate their qualifications into the National Qualifications Framework which employs a method of unit design that is largely unsuited to the general and professional educational programmes that are typically offered within universities. From the perspective of university education, the critical problem areas include:

- the behaviourist/reductionist definition of unit standards and their implications for course design;
- the separation of unit standards from the course design process;
- the registration of elements/objectives;
- the association of performance criteria with course elements rather than with the assessment tasks that students undertake;
- lack of recognition of research findings on the transfer of generic skills;
- the incompatibility of the Framework for integrating postgraduate university programmes;
- the incompatibility of unit standards with the notion of excellence;
- the disruptive effect of unit-standard methodology on the coherence and integrity of a university degree;
- the difficulty of assigning academic units to a level in the Famework;
- different philosophies on credit transfer and the recognition of prior learning.

The following discussion elaborates on each of these items[4].

4. For a more detailed exposition of many of the points made below, see Cedric Hall, 'Obstacles to the Integration of University Qualifications and Courses into the NZQA Framework', *Higher Education in New Zealand*, Occasional Paper Number 1 (Wellington: University Teaching Development Centre, Victoria University of Wellington, 1994).

2.1 The Behaviourist/Reductionist Definition of Unit Standards

In several respects the unit standard model followed by the NZQA resembles closely the behaviourist method of specifying objectives developed by Mager [5]. Under Mager's method, a behavioural objective is expected to identify a specific learning outcome, the conditions under which the outcome is to be demonstrated, and the criteria against which performance will be judged as meeting the objective. These three components are reflected in the NZQA unit standard requirements in the terms 'elements', 'range' and 'performance criteria'. The effect of such an approach is to encourage the fragmentation of teaching and learning, with knowledge and skills being packaged into discrete components which are then assessed in a mechanistic fashion in isolation from each other. University education is about the *acquisition* and *integration* of skills; the effect of the unit-standard methodology, whether intended or not, is to encourage acquisition and discourage integration.

Research on the use of educational objectives has consistently found that behaviourist systems are inappropriate for most general educational contexts and, indeed, for many professional contexts[6]. This is not to argue that objectives and performance criteria should not be set, but rather that their form should emphasise understanding, argument, analysis, integration and problem-solving, and not simply focus on readily measured behaviours such as 'list', 'define', 'state', and 'demonstrate'. General educational objectives should also be capable of dealing with 'process' as well as 'outcome' behaviours, yet the NZQA expressly rejects process objectives as being appropriate for inclusion in unit standards[7].

The NZVCC accepts that it is not the stated intent of the NZQA to encourage a behaviourist approach to course design. However, by starting with a Mager-style perspective on behavioural objectives, the NZQA in fact makes it difficult for providers to follow a course design model which is not reductionist in approach. If the NZQA is to achieve the aim of encouraging providers of general and professional educational programmes to develop integrated approaches to course design and assessment, it should first address the rigidity of its own initial requirements.

5. R Mager, *Preparing Instructional Objectives* (California: Fearon, 1968)

6. See A R Viskovic, 'Learning and Competence: A Critique of NZQA's Perspective as Evidenced by the Unit Standards Requirements', in M Parer (ed.), *Research and Development in Higher Education*, HERDSA, Vol. 15 (Churchill, Victoria: HERDSA, 1992), pp. 334-341.

7. See, for example, the NZQA position paper, 'The New Zealand Qualifications Framework', of 20 September 1993, p. 3 (i).

2.2 *The Separation of Unit Standards from the Course Design Process*

Under the Framework method of course development, unit standards are developed by Industry Training Organisations or National Standards Bodies from a thorough analysis of the training and educational needs of employees in the industries and professions concerned. The unit delivery is then developed by the provider to meet the unit standards. In effect this creates a two stage process which, from the perspective of course coherence, is likely to create problems for providers. A critical pedagogical issue is the extent to which the two stages are coordinated and *iterative*. If in the process of course development, flaws or improvements in the initial unit standards are identified, opportunity must exist for further shaping of these standards. The development of the two - unit standards and unit delivery - should be closely integrated.

In a university context, the recommended approach to course (paper) design is first to identify the data from which the course is to be developed. These data will draw selectively on the knowledge base of the subject, the generic skills identified as appropriate to the course, research and communication skills, and attitudes, values and inter-personal skills relevant to scholarship in the subject. University teachers are encouraged to draft a related set of objectives and develop the content, assessment and teaching approach consistent with those objectives. In drafting the objectives, a university teacher will need to consider not only the content of the course but also the students' backgrounds, the objectives of the programme to which the course relates, any broader considerations (e.g. the graduate profile for the qualification and the university's charter), and the constraints under which teacher and students will operate. Course development proceeds as an iterative process. The initial objectives may be modified several times as the teacher progressively integrates assessment, content, type of delivery, availability of resources, student background, and so on into a coherent whole. It would be unusual for the final objectives to be identical to those that are initially adopted. Furthermore, many academics develop procedures for allowing students to negotiate specific objectives of relevance to their personal study. This is especially important in open learning contexts where students are given, to a greater or lesser extent, choice in selecting topics or assignments that are relevant to their own situation - academic, cultural, or professional.

The process of course design is dynamic. Knowledge and context are not static and the design process must allow for change and development; yet the unit-standard method-

ology is pedagogically weak precisely on this point. The elements and performance criteria specified in a unit standard act like coat pegs on which providers must hang content, assessment and teaching. Unit standards are not sensitive to change in knowledge and context - they are registered and must be addressed even though the course design may clearly indicate that the unit standard is unsatisfactory for implementation. University education does not have this problem in course design, for it does not separate the specification of objectives and performance criteria from the development of course content, sequence, assessment and delivery.

The NZVCC appreciates that essential differences exist between certain kinds of vocational training and university education. Unlike the NZQA, the universities are not attempting to establish a single set of national standards in any subject or its sub-fields. For example, there is no reason why history as taught at Massey University should be the same (i.e. have the same objectives, lecture content, and emphasis) as that taught at Auckland or Otago. Indeed, programme and course approval procedures followed by the Committee on University Academic Programmes, address the distinctive 'flavour' of each university's proposal. Vocational training, on the other hand, may legitimately require that the skills of trainees in different parts of the country conform to common objectives and standards for employment. However, the NZVCC sees no reason why universities should be forced into a philosophy of course design simply because it has merit in certain areas of vocational training. University education should not be constrained by a model of development which is unsuited to its particular goals.

2.3 The Registration of Elements/Objectives

Whereas elements (i.e. outcome objectives) are required to be registered for the NZQA Framework, they are not part of the approval requirements for individual university courses. The NZVCC's view is that each course should identify the expectations held of students - and this seems appropriately done through a statement of objectives - but that these expectations remain part of the course delivery (and are specified in the course outline) rather than form part of the registration requirements.

The NZVCC believes that the objectives for individual courses or papers should be seen as 'hypotheses' for giving focus to student learning; that is, initial directions which are subject to verification or change. Permanency is not an expected, or even desirable, characteristic of learning objectives. New knowledge, a change in context, differ-

ent emphases, or the results of recent student evaluations, will inevitably lead to modifications or substantial revisions. Similarly, a new teacher may want to redirect the thrust of an established course in line with the particular strengths he or she brings. The present university system recognises that what is taught and what is emphasised (e.g. through the objectives) is to some extent open to interpretation by the teachers; two lecturers offering the same material are unlikely to set precisely the same objectives although some overlap might be expected. However, if objectives are registered in the way required for the Framework, 'central' approval would be needed before a change can be introduced. This could result in considerable delay (e.g. 12 months or longer) during which time a new teacher would be bound by objectives which were not flexible enough to allow a different approach to teaching or assessment to be taken or new knowledge or developments in a field to be included.

2.4 The Association of Performance Criteria with Course Elements

Under the NZQA's approach, performance criteria are associated and registered with the elements ('objectives') of a course. It follows from the preceding point that if objectives are open to alteration from year to year, then the associated performance criteria should also be free to vary. However, a further problem exists if the unit-standard methodology approach is followed. If assessment criteria are associated with each objective, further encouragement exists for assessing each objective in isolation, and a checklist mentality is fostered. As already argued, learning and teaching should be directed towards both the *acquisition* and *integration* of knowledge, skills and values. This suggests that assessment criteria should be associated with the tasks that students undertake (exams, essays, reports, projects, etc.) and that these tasks should be structured so that the different learning objectives can be sensibly integrated through such intellectual processes as composition, argument, design, problem-solving and research.

The argument here is not about whether performance criteria should be stated, but rather at what point in the process these criteria should be made explicit to students. Pedagogically, it makes most sense to relate criteria to the tasks students are set, for this is where the criteria are likely to be most clearly understood and taken into account by students.

In defence of the NZQA, it should be stated that their advisers discourage providers from developing a checklist approach to assessment in contexts which call for an integrated approach. Perhaps, however, this highlights the superficiality of trying to specify performance criteria too early in the course design process. Indeed, for many published unit standards, it is difficult to see how the stated criteria can be properly interpreted as genuine performance criteria. Many statements look to be no more than a further refinement of the element; that is, additional (and more specific) learning outcomes with the only overt difference being that the 'action verb' has been removed from the front of each statement. Perhaps the NZQA has not taken account of the essential distinguishing features of learning outcomes and performance criteria.

2.5 The Need to Recognise Recent Research Findings on the Transfer of Generic Skills

The NZQA, in its attempts to facilitate mobility through the operation of the Framework, is currently considering the development of generic unit standards (e.g. on problem solving) which would then become part of a wide range of programmes or qualifications. However, a reading of the educational literature suggests that the NZQA can expect only a moderate return for its efforts to facilitate transfer in this way. The following points summarise the key research findings[8]:

- Confusion and inconsistencies exist in the use of terminology: 'generic' skills refer to the higher order mental operations relevant to a range of subjects and disciplines in higher education. Such skills tend to be 'cognitive' in nature and include reasoning, critical analysis, synthesis, composition, problem solving, research (in its various forms and approaches), communication and aspects of numeracy. Certain attitudes can also be thought of as generic in the sense that they are integral to the teaching and learning in most university subjects; examples include respect for the ownership of knowledge, and willingness to reflect on the validity of an argument before reaching a conclusion.
- Generic skills, although identifiable across a wide range of disciplines, cannot be developed independently of content and context. Analysis, reasoning, problem solving, and the like can only develop through study of a body or domain of

8. See, for example, J Clanchy and B Ballard, *Generic Skills in the Context of Higher Education* (Canberra: Australian National University Study Skills Centre, January, 1993).

knowledge. In this respect, each discipline has its own particular knowledge structures and language, and each draws upon a particular range of methodologies for research, problem solving and communication; problem solving in economics, for example, is quite different from problem solving in psychology or physics. Because generic skills are developed within disciplinary or subject contexts, their *form* is dependent on these contexts. Even subjects which draw upon a similar mode of communication (e.g. essay writing) differ in their expectations of the form and conventions that such communication should take or follow. This is why learning support programmes in universities which teach the skills and techniques of essay writing in a cross-disciplinary mode are generally much less successful than programmes which are contextually based.

- Convincing research evidence that generic skills are directly transferable across widely different contexts is lacking; the supportive evidence that does exist generally relates to situations which require only superficial application of such skills. Research suggests that transfer of skills between domains depends on (a) the similarity of the knowledge and content structures in the domains concerned, (b) the intellectual ability of the learner, and (c) the breadth and depth of the learner's educational and work experience.

For these reasons, the NZVCC encourages the undertaking of further research by the NZQA into the transferability of generic skills and competencies, and supports the notion of different industries and professional groups sharing unit standards if they are contextually appropriate in different work settings. However, the NZVCC has serious reservations about the registration of unit standards which are considered context-free or knowledge-independent. The application of such a standard in one setting will be quite different from another; students who achieve the standard in one domain cannot be assumed to be competent in the same skills in other domains. The research to date has very clear implications for policies on the transfer of credit within the Framework. It places limits or constraints on procedures that would otherwise enable a more open approach to be taken to credit transfer and the recognition of prior learning. It also limits certain strategies for reducing the scale and cost of the Framework, namely, the merging of unit standards and the development of context free elements and performance criteria.

2.6 *The Incompatibility of Unit Standards with the Notion of Excellence*

The NZVCC believes that the unit-standard methodology, because of its emphasis on 'competence', does not give sufficient recognition to 'excellence', and, furthermore, that it lacks adequate criteria for identifying and evaluating 'excellence' in the work of students.

The NZVCC appreciates that there are different definitions and models of competency, and that competency does not preclude the assessment of excellence. The NZVCC also acknowledges that the NZQA itself is keen to encourage industry groups and providers to pursue competency models which include, where appropriate, recognition of excellence.

However, the existing unit-standard methodology, because of its reductionist nature, fails to promote the conditions essential for encouraging and assessing excellence. The methodology is far more suited to the teaching and assessment of skills of a technical or practical nature than to the higher order mental operations that universities associate with the notion of excellence: critical analysis and problem-solving, the synthesis and production of knowledge, and the conduct of original research. One should remember, nevertheless, that the desirability of the methodology even in the domain of vocational subjects has been recently questioned.

The NZVCC also doubts whether an *achievement-based approach*, involving level statements, adequately addresses the definition and assessment of excellence. NZQA appears to have undue faith in the precision of objectives and level statements; such statements can guide students as to what is expected of them - and this can only be beneficial - but their capacity for encompassing with precision the qualities that identify a piece of work as being excellent is very limited. While the NZVCC fully supports the individual initiatives of academic groups to follow an achievement-based approach, if that approach is appropriate to their context, it firmly believes that excellence is easier to recognise after the event than it is to define in precise terms in advance.

2.7 *The Disruptive Effect of Unit-Standard Methodology on the Coherence and Integrity of a University Degree*

The assumptions of the Framework make no allowance for the fact that university degrees are essentially different in kind from other types of degree, both in the nature of their content, and of the training they provide. University degrees consist largely, and in many cases exclusively, of academic courses, in which the emphasis is on the study of phenomena in their theoretical aspects, rather than in terms of applied practice. This is true even of degrees that contain a substantial component of professional training. In the Bachelor of Education, for example, practical training in teaching methods arises out of the theoretical study of educational philosophy, history and issues in education. Correspondingly, students are not simply trained in the acquisition of skills, or even in the mastery of a body of knowledge, but into a more general capacity to interpret and critically evaluate the ways in which that knowledge has been understood, and the skills applied, over time. One advantage of this kind of academic training is that it offers a greater flexibility to graduates in their choice of employment than is possible with the type of vocational education that is based on the notion of fairly precise boundaries to blocks of knowledge.

The distinctive nature of university education can be illustrated from the way languages are studied at the university, as distinct from the way they are studied at other types of tertiary institution. In a university language programme students are engaged not only in language acquisition, but also in studying how the language has been used to construct social identity and express cultural values and attitudes, whether in literature, oratory, or film. Moreover, students will acquire an informed insight into language as a phenomenon, through the linguistic study of the structure and uses of a particular language in relation to those of other languages. As this example illustrates, a graduate is ultimately expected to have acquired, through the cumulative, structured, programme of study that constitutes a university degree, to have acquired a broader and deeper understanding of human knowledge and activities than is required in any other type of degree. This is especially true of degrees that do not require a comparable spread of disciplines in their composition, or which are not grounded in the same type of theoretically and critically based approach to its subject material.

The imposition of the unit-standard methodology on university courses and programmes would radically impair the ability of the universities to produce graduates with the skills, knowledge, and capacities that society has historically valued in them. At the most basic level, unit-standard methodology would substantially change the complexion of academic papers by fragmenting them into a series of modules, and by increasing the emphasis on outputs defined as measurable skills at the expense of the equally important process whereby the capacity for critical thought is progressively developed. At a more complex level, unit-standard methodology would disrupt the integrity of academic programmes by failing to recognise adequately both the interrelatedness of courses or papers within a programme, and also their particular significance for the coherence of the programme overall. Most seriously, unit-standard methodology would seriously impair the process whereby critical enquiry and intellectual independence are developed in students, because of the inhibiting effect of performance criteria when conceived of as skills-based learning outcomes. Were higher order thinking skills capable of being assessed in a strictly quantifiable way, this might not be such a problem, but experience has shown, as in the case of the experiment with standards-based assessment conducted by the Department of English at the University of Otago, that the standards-based approach is incapable of doing justice to the complex conceptual process that takes place, for example, in the writing of a critical essay[9]. Far less can it do justice to the kind of self-directed research enquiry that is expected of students at the upper levels of university education, in which a long period of searching and reflection by teacher and student alike might have no readily stated end-point beyond the required submission of a major essay. In short, unit-standard methodology is incapable of fully providing, or accounting for, the overall capacities that a student gains in the course of completing a university degree.

A final negative impact of unit-standard methodology would be to reduce the depth and breadth of intellectual training received in a university degree by reducing the sheer 'volume' of study involved in it, in cases where a student is deemed to have sufficient competence in a subject to enter directly into its advanced levels at the university. Entry to advanced levels already occurs in certain subjects, such as physics or some languages. But it is not current practice in the universities to allow students to reduce either the time or intellectual effort that they put into study towards their degree. They are required to take additional papers in the subject should they wish to major in it. This is because, given the breadth and depth of approach described above, there is no way that a student can ever be deemed to have exhausted the possibilities for fur-

9. See *Standards-Based Assessment in the University: A Case Study* (Wellington: New Zealand Qualifications Authority, 1992).

ther learning inherent in a subject, and because the *process* whereby learning is acquired is deemed to be as important as the knowledge is itself. It is precisely for this reason that university degree study is conceived of as involving more than simply a set of skills to be mastered, and the unit-standard methodology proposed for the Framework would seriously impair the attainment of that 'more'.

2.8 The Difficulty of Assigning Academic Units to a Level in the Framework

If the ability of unit-standard methodology to accommodate academic or general subjects is at all in doubt, it follows that assigning academic units to a level in the Framework is equally problematical. Given the complex mixture of subject-specific knowledge and disciplinary skills, together with the broader conceptual skills that characterise academic study, it would be rash to assume an equivalency of academic units of learning to vocational units that did not involve the same blend of intellectual activities. The possibility of establishing equivalency between academic and vocational units becomes even more remote when one acknowledges the difficulty of finding any common denominator between academic and vocational units that could be identified as a shared generic skill, especially once it is accepted that even generic skills are to a large extent inseparable from the disciplinary context in which they are developed. In the absence of any soundly established, or widely accepted, criteria for establishing equivalency between academic and vocational subjects, it is difficult to see how the assignment of academic units to levels of the Framework is anything other than arbitrary and factitious.

2.9 The Incompatibility of the Framework for Integrating Postgraduate University Programmes

Broadly speaking, university qualifications are registered by the NZVCC at four levels - bachelors, honours, masters and doctorate. Other qualifications, such as diplomas and certificates, are related to this structure according to their purpose and composition. While recent NZQA documentation indicates broad parallels between the levels of the Framework and university bachelors' degree programmes, all postgraduate pro-

grammes are registered on the Framework at level 8. This is totally inadequate for dealing with the different levels and progression that exist within and between such programmes, and does not accommodate such specialist activities as work intended for the maintenance of professional practising certificates. In its present form, the Framework is far too coarse for dealing with the detail and complexity of university qualifications.

2.10 *Different Philosophies on Credit Transfer and the Recognition of Prior Learning*

The NZVCC recognises that the NZQA quite reasonably wishes to pursue the means by which students can move easily between institutions or re-direct their study to meet changing personal and professional needs. Effective systems of credit transfer are essential for encouraging continued participation in higher education and professional training.

Similarly, the NZVCC acknowledges that the NZQA should pursue mechanisms for recognising the relevant work or life experience of students where that experience is demonstrably equivalent to, or as important as, formal educational achievement. It is the view of the NZVCC, however, that recognition for prior learning needs to be assessed against more than unit standards. Having made that point, the NZVCC accepts that developing mechanisms for credit transfer and the recognition of prior learning within the tertiary educational sector is consistent with the philosophy of the Framework and the responsibilities placed on the NZQA through the Education Amendment Act.

The direction being pursued by NZQA on these matters, however, could lead to the devaluation of higher education qualifications. Under the NZQA model, as currently articulated, a student may offer for credit the same unit standard as many times as there are qualifications for which that unit is required. The universities see this as devaluing the effort and personal achievement normally expected of students who aspire to attain higher education qualifications. For example, it is possible for a student at a New Zealand university to enrol for the BA and complete the requirements for a BSc in the process (e.g. by choosing subjects such as mathematics, psychology and geography). However, universities generally do not allow the transfer of more than a third of

total credit for a degree to another qualification unless the second qualification is an advancement over, or extension of, the first; students are expected to complete a significant amount of further study in order to be entitled to an additional major qualification. Under the NZQA scheme, however, students would only need to top up the minimum to achieve a second qualification - all previously obtained relevant credits would be transferred.

At the present time, universities are reviewing their policies and procedures on credit transfer and the recognition of prior learning. One positive outcome of this process would be greater uniformity between universities in their policies and practice. However, it is clear that sound policies must take into account many factors and not just the mobility that NZQA wishes to pursue: the standing of a qualification, pedagogical principles, comparability between university and non-university programmes, and international credibility all demand careful consideration.

Part 3
A Dual Structure: The Universities' Preferred Option

As noted earlier, the Education Amendment Act 1990 requires the NZQA to develop a framework for registering and relating national secondary and post-secondary qualifications in a way that 'students and the public can understand' and give recognition to 'competency already achieved'. The NZVCC believes that these purposes of the Act can be best achieved by maintaining and enhancing a dual structure in which degrees are handled according to procedures that are appropriate to their aims, nature, and complexity, and in which the relationship between degrees is determined according to a range of stated principles. Specifically, the NZVCC believes that the procedures of the Committee on University Academic Programmes and the New Zealand Universities' Academic Audit Unit are the most appropriate way of satisfying the gazetted criteria for the approval and accreditation of university courses of study[10]. This view is based on the following considerations:

- the belief that university study programmes cannot achieve congruence with the NZQA Framework, given problems concerning:
  - (a) the limitations of unit-standard methodology in dealing with academic study;
  - (b) the difficulty of assigning university qualifications to the levels of the Framework;
  - (c) different views on the transferability of generic skills across different subject areas;
- the effectiveness of existing university procedures for dealing with course approvals, accreditation, and quality assurance relating to degree study;
- the logistical difficulties of implementing the NZQA model in the university context;
- the resource implications of implementing the Framework.

10. These procedures are fully described in *The New Zealand Vice-Chancellors' Committee Committee on University Academic Programmes: Functions and Procedures* (Wellington: New Zealand Vice-Chancellors' Committee, 1993).

The first of these considerations has already been explored at length in Part 2. The rest of this section will explain in further detail the remaining considerations, and will conclude with a summary of the main propositions that represent the NZVCC's position.

3.1 University Procedures for Course Approvals, Accreditation, and Quality Assurance

New Zealand universities were amongst the first in the English-speaking world to set up comprehensive procedures with which to determine course approval. Those procedures were developed over many years by each university, as well as by the University Grants Committee. They have since been refined and extended by the New Zealand Vice-Chancellors' Committee, and are continuously being modified in response to changing conditions and needs. Peer review and inter-university assessment are the key elements of those procedures, with each institution recognising the importance of consulting the many interested groups: students, employers, professional bodies, and scholars in other parts of the world. Despite the legislated role of the New Zealand Vice-Chancellors' Committee as the approval body for university qualifications, each course of study remains the product of the university where it is offered. There is not in this country a national system of university qualifications. Rather, once a university has met the rigorous, inter-institutional requirements for course approval, it is then free to impart its 'flavour' to its own programmes.

University qualifications include courses targeted to the needs of particular vocations as well as courses of a more general nature, yet students in all university study programmes are taught the importance of treating information critically, developing independence of thought, and striving for originality. In addition, students learn techniques appropriate to their specialist interests, but which may also have wider application.

Over the years, the universities have developed comprehensive routines with which to measure the quality of their study programmes, and to obtain and use feedback from students, employers and professional bodies. By determining the nature and amount of formal credit which may be carried into a university study programme, the universities assist students wishing to transfer from elsewhere in the tertiary sector. While they have not used the term 'framework' to describe that suite of procedures, the universities are agreed on the necessity for comprehensive, fully described and accessible regulations, as well as information on the content and objectives of each paper.

In the Committee on University Academic Programmes - which comprises a chairperson and one representative from each of the seven universities, with representation from the colleges of education and the polytechnics - New Zealand universities have a body which is well-placed to take a broad view of tertiary education and to deal with other educational organisations. Members of that Committee meet quarterly with staff of the New Zealand Qualifications Authority to discuss policy on university entrance, credit transfer within the tertiary sector, recognition of prior learning, and the role of research in higher degrees. The Committee assists the Qualifications Authority by nominating senior university staff to serve on approval and accreditation panels for degree and related qualifications in other tertiary sectors. The universities have also provided staff to serve on the Authority's Industry Advisory Groups.

New Zealand universities recognise the importance of preparing graduates for life and employment in a world where relatively unimpeded competition, ready movement of finance and skilled labour, and the need for continuing training are likely to be the rule. These days, most of the universities' vocationally oriented programmes have boards of study to facilitate the flow of information between workplace and classroom, and to ensure that the courses will continue to meet employers' needs. Professional bodies have long been involved with study programmes such as architecture, law, accountancy, dentistry, medicine, and surveying, and in the registration and admission of graduates. Staff of all university departments are encouraged to publish their research findings in international serials, participate in subject conferences and workshops, take sabbatical leave in major overseas institutions, and have their students' research assessed by acknowledged leaders in the discipline. All such activities ensure that university courses and staff are subject to continuing peer scrutiny: within the institution, in other New Zealand universities and research organisations, by members of the relevant professional group, and by the international community of scholars. An Academic Audit Unit has recently been established, with a widely representative advisory board.

It is the view of the NZVCC that existing procedures for registering, accrediting, and assuring the quality of university courses are more efficient and cost-effective than the new procedures proposed under the Framework. As mentioned, the NZVCC, through its Committee on University Academic Programmes approves the offering of new programmes in universities; it oversees the regulations establishing the criteria that must be met if new programmes are to be mounted. In turn, each university is required to operate its own assurance systems to check the quality of the content and delivery of individual courses and papers; such systems include the use of external examiners, periodic departmental reviews and regular evaluation of teaching. The system is also internationally comparable in that the degrees of the New Zealand universities are, for the most part, internationally recognised. The work of the new Universities' Academic

Audit Unit can only strengthen these and other aspects of the quality systems operating both within and across universities. It is hard to see how the model proposed by the NZQA could duplicate the effectiveness of this system in dealing with such a complex array of qualifications, or deliver the same level of quality assurance, or operate with a comparable cost-effectiveness.

3.2 *The Logistical Difficulties of Implementing the NZQA Model in the University Context*

At present, the seven public NZ universities offer over 500 qualifications (degrees, diplomas and certificates) comprising close to 9,000 papers, which means that their reformulation into a unit-standard format would be a huge undertaking. University staff would undoubtedly be willing to engage in such a task if the educational benefits to the universities and the communities they serve were clear. However, it is the view of the NZVCC that, given the doubtful appropriateness of unit-standard methodology for university studies, it is undesirable for university staff to be required to divert time and attention away from teaching and research to accomplish this task in the absence of a sounder pedagogical justification for doing so.

3.3 *The Resource Implications of Implementing the Framework*

The NZVCC is concerned that the integration of university qualifications into the Framework would require the expenditure of large amounts of money that could be used to much better effect in resourcing programmes. Resources may indeed be deflected from the providers of tertiary education, with negative consequences. Even without the inclusion of university qualifications, the scale of the activity and resources required to register unit standards for all senior secondary and vocational qualifications will be vast. Approximately 1,000 units have been registered to date, and in excess of 6,000 are expected over the next 12-24 months. Some estimates suggest that this figure will exceed 10,000 units.[11] If one adds to this the cost and effort needed to develop, implement, and monitor the associated policies for quality assurance, credit

11. See Hall, 'Obstacles to the Integration of University Qualifications and Courses into the NZQA Framework', p. 21, note 20.

transfer, the recognition of prior learning, and the recording of student performance, the task seems sufficiently daunting without the additional burden that the inclusion of university qualifications would impose.

3.4 *The Way Forward*

The way forward for the NZVCC and the NZQA seems obvious. Rather than the two statutory bodies trying to merge their separate systems into a single framework, they should formally recognise a dual structure and put in place systems for dealing with movement between the two. With formal recognition of this structure, matters such as credit transfer, recognition of prior learning, quality assurance and other joint issues facing the NZQA and universities are much more likely to be tackled constructively with greater chance of success.

The separation of university and non-university qualifications should not be interpreted as elitism on the part of the universities. Indeed, the NZVCC would propose that many, if not all, of the degree programmes now being approved in the polytechnic sector would benefit from a university-style system rather than the current NZQA approach. The concern of the universities to preserve and enhance a dual structure arises from recognition that the present requirements of the Framework, if adopted by universities, would force institutions into compromising important features of their education as well as creating unnecessary workload on already busy staff, whereas a dual structure would free both the NZQA and universities to pursue models of course development and approval without compromising the purpose and nature of each other's activities. In order to meet the legislative obligations of each body (NZQA and NZVCC), efforts could then be concentrated on the interface between the two structures (quality assurance, credit transfer, qualification equivalence, etc.) rather than on the impractical task of trying to merge one system into the other. It is hard to believe, given the current level of educational funding, that the latter course of action is a serious option.

3.5 Conclusions

In view of the considerations outlined above concerning pedagogical, structural, procedural, and costing problems associated with integrating university qualifications into the NZQA Framework, the NZVCC affirms the following propositions;

(1) that it should be recognised that the National Qualifications Framework in its present form is insufficiently flexible to deal with the complete range of programmes in the tertiary sector, and that alternatives to the Framework's conception of unit-standards and levels be sought as a means of fostering a more integrative, less reductionist approach to course structure and development;

(2) that a structure involving a dual framework should be recognised as the most effective and productive way of dealing with the differences of approach and philosophy between the universities and the NZQA, and also the most cost-effective;

(3) that the NZVCC and NZQA should continue to work constructively towards coordinated procedures for recognising prior learning, and for credit transfer across the entire tertiary education sector;

(4) that the universities should continue to seek to clarify for the sake of professional and public understanding the central role of research and scholarship in academic training, the nature of subject progression over the term of an academic qualification, the balance between technical and academic skills in each study programme, the distinction between certificates, diplomas and degrees, and how best to define and assess academic attainment.

With good will on all sides, all sectors of the education system in New Zealand are likely to emerge the stronger as a result of the resolution of the issues identified in this paper.